



**mwe.com**

David K. Momborquette  
Attorney at Law  
dmomborquette@mwe.com  
+1 212 547 5490

February 18, 2025

**VIA ECF**

Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
Thurgood Marshall  
United States Courthouse  
40 Foley Square, Room 2103  
New York, NY 10007

Re: *GEM Yield Bahamas Limited, et al. v. Mullen Technologies, Inc. et al.*, No. 1:24-cv-01120-KPF  
Letter Motion to File Document in Redacted Form

To the Honorable Katherine Polk Failla:

We represent Respondents Mullen Technologies, Inc. and Mullen Automotive, Inc. in the above-referenced action. Pursuant to Rules 2(C) and 9(B) of Your Honor's Individual Rules of Practice in Civil Cases, we respectfully submit this letter motion seeking leave to redact limited portions of Exhibit A to Respondents' February 18, 2025 Letter to the Court providing proof of notice to Respondents' officers and directors of the Court's Judgment (ECF No. 148).<sup>1</sup>

Respondents' requested redactions—which cover only the email addresses of the officers and directors identified in Exhibit A—are warranted because they are narrowly tailored to protect personal identifying information that, if disclosed, could lead to the unnecessary harassment of Respondents' respective officers and directors, and further, disrupt their efforts to fulfill their duties. *See, e.g., Playtex Prods., LLC v. Munchkin, Inc.*, 2016 WL 1276450, at \*11 (S.D.N.Y. Mar. 29, 2016) (permitting limited redactions of information that implicated plaintiffs' privacy interests and that, if disclosed, could harm plaintiffs).

---

<sup>1</sup> In accordance with the directives contained in the Court's Judgment (*see* ECF No. 148 at 2), a copy of Respondents' letter providing proof of notice is being filed simultaneously herewith.

Honorable Katherine Polk Failla  
February 18, 2025  
Page 2

As such, Respondents respectfully request that the Court permit them to file portions of Exhibit A in redacted form.

Respectfully submitted,

/s/ David K. Momborquette

David K. Momborquette

The Court has reviewed Respondents' letter motion to seal (Dkt. #149) and Petitioners' letter in opposition (Dkt. #152). It appears that Petitioners' counsel has not reviewed the version of Exhibit A without redactions, which was simultaneously filed under seal viewable to the parties and the Court only. (Dkt. #150-1).

The Court hereby GRANTS Respondents' letter motion to seal. The Clerk of Court is directed to file docket entry 150-1 under seal, viewable only to the parties and the Court.

The Clerk of Court is further directed to terminate the pending motion at docket entry 149.

Dated: February 19, 2025 SO ORDERED.  
New York, New York



HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE